

AFFIDAVIT OF DANIEL CAMPBELL

I, Daniel Campbell, state:

INTRODUCTION

1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) since 1990. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7). I am currently assigned to the Boston Group VI Field Office. As an ATF Special Agent, my duties include the investigation of violations of federal laws.

2. This affidavit is based on an ongoing, multi-agency investigation into the criminal activities of a criminal organization and street gang known as “NOB.” NOB is an abbreviation for Norton/Olney/Barry – streets in Boston. NOB is a Boston-based gang and is associated with the Wendover street gang. The agencies involved in the investigation include, but are not limited to: the Boston Police Department (“BPD”), the ATF, the Suffolk County Sheriff’s Department, the Federal Bureau of Investigation (“FBI”), the Massachusetts State Police (“MSP”), the Randolph Police Department, the Stoughton Police Department, the Quincy Police Department, and the New Bedford Police Department.

3. This affidavit is being submitted in support of a criminal complaint for members and associates of NOB for various crimes, including: RICO conspiracy in violation of 18 U.S.C. §1962(d); violent crimes in aid of racketeering in violation of 18 U.S.C. §1959; conspiracy to distribute controlled substances in violation of 21 U.S.C. §846; possession with intent to distribute controlled substances in violation of 21 U.S.C. §841(a)(1); possession of a firearm in furtherance of a drug trafficking crime in violation of 18 U.S.C. §924(c); crossing state lines for

the purposes of prostitution in violation of 18 U.S.C. §2421 (the Mann Act); possession of a firearm with an obliterated serial number in violation of 18 U.S.C. §922(k); and felon in possession of a firearm in violation of 18 U.S.C. §922(g)(1).

4. The facts in this affidavit come from my review of records and/or reports, my training and experience, and information obtained from other agents, officers and witnesses. This affidavit is only intended to establish that there is probable cause for the requested complaint and does not set forth all of the facts in regard to this ongoing investigation.

5. There is probable cause to believe that the following defendants violated federal law as set forth herein:

(a) **Michael Brandao (a/k/a “G Fredo” and “Frizzblock Fredo”)** - Brandao is a member of NOB. Based on the investigation, Brandao has been involved in multiple NOB-related crimes both as a juvenile and an adult.¹ As discussed below, these crimes include: (1) a 2018 murder in Boston (when Brandao was a juvenile); (2) a conspiracy/attempt to commit another gang-related murder in Boston shortly thereafter (when Brandao was a juvenile); (3) and drug trafficking as an adult. Brandao has been involved in the production/performance of numerous rap recordings and videos promoting NOB’s illegal activities. In these videos,

¹ As an example of Brandao’s involvement with other NOB members/associates in criminal activities, investigators have identified that Brandao was involved with defendant David Rodriguez and at least three other NOB members/associates in the theft of a vehicle from Dorchester, MA, on or about February 17, 2020. A five-year-old girl was in the vehicle at the time that it was stolen. Based on the investigation, vehicles stolen by NOB are frequently used to commit violent crimes. This was especially true during this period in February 2020 in which three cars were stolen and two of them were used in murders. Investigators have video footage of the five NOB members/associates getting into a vehicle driven by Rodriguez. Based on the investigation, one of the NOB members/associates got out Rodriguez’s vehicle and jumped into a different vehicle (with the five-year old victim) after her parent exited the vehicle to run an errand. The five-year-old victim was driven from the area in the stolen vehicle, and subsequently abandoned in Randolph, MA.

Brandao has repeatedly stated that: (1) he is an active and leading member of NOB; (2) he has committed multiple shootings and murders on behalf of the organization; and (3) he and the gang will continue to commit gang-related violence. Brandao has openly flashed gang hand signs and worn gang-related clothing. There is probable cause to believe that Brandao has violated the following federal criminal laws: RICO conspiracy in violation of 18 U.S.C. §1962(d); conspiracy to distribute controlled substances in violation of 21 U.S.C. §846; and possession with intent to distribute controlled substances in violation of 21 U.S.C. §841(a)(1).

(b) **Kelvin Barros (a/k/a “Kal” or “7981 Kal”)** - Barros is a member of NOB, and has been involved in various crimes, including drug trafficking, violent crimes, and sex trafficking. Barros has been identified on recorded jail calls with other NOB members/associates discussing gang-related topics, including violence and drug trafficking. In jail calls, Barros has bragged about committing shootings, and, in coded language, offered to participate in shootings upon being released from custody. Barros has openly flashed gang hand signs and has gang-related tattoos. Barros has also been involved in the production/performance of numerous rap recordings and videos promoting NOB’s illegal activities, including its violent crimes and drug trafficking. As set forth below, there is probable cause to believe that he has violated the following federal criminal laws: RICO conspiracy in violation of 18 U.S.C. §1962(d); conspiracy to distribute controlled substances in violation of 21 U.S.C. §846; and possession with intent to distribute controlled substances in violation of 21 U.S.C. §841(a)(1).

(c) **Ricky Pina (a/k/a “Blake”)** – Pina is a member of NOB, and has been involved in various crimes, including drug trafficking and violent crimes. In numerous recorded jail calls, Pina has identified as a member of NOB during discussions involving ongoing gang activities.

Pina has flashed gang hand signs and participated in NOB-related rap videos. As set forth below, there is probable cause to believe that Pina has violated the following federal criminal laws: RICO conspiracy in violation of 18 U.S.C. §1962(d); conspiracy to distribute controlled substances in violation of 21 U.S.C. §846; and possession with intent to distribute controlled substances in violation of 21 U.S.C. §841(a)(1).

(d) **David Rodriguez (a/k/a “D”)** – Rodriguez is a member/associate of NOB. There is probable cause to believe that he has committed at least two gang-related murders in Boston in 2019 and 2020. Rodriguez has been charged in Suffolk County with one of the murders, which occurred in Dorchester on or about February 5, 2020.² He is presently being held in state custody on the murder charge and related charges. As set forth below, there is probable cause to believe that Rodriguez has violated the following federal criminal laws: RICO conspiracy in violation of 18 U.S.C. §1962(d).

(e) **Wilson Goncalves-Mendes (a/k/a “Dub”)** – Goncalves-Mendes is a member of NOB. Goncalves-Mendes has been identified as a member of NOB in gang-related videos. In addition, Goncalves-Mendes has posted gang-related materials on social media platforms. There is probable cause to believe that Goncalves-Mendes has been involved in at least three NOB-related shootings in New Bedford and Stoughton (all of which involved victims), as well as drug trafficking. As set forth below, there is probable cause to believe that Goncalves-Mendes has

² Rodriguez was previously charged federally by complaint with drug trafficking crimes and appeared before this Court on or about February 19, 2020, after federal and state search warrants were executed at his residence and the nearby residence of his brother. The execution of these warrants recovered various amounts of marijuana packaged consistent with trafficking, drug trafficking paraphernalia, a significant amount of United States currency, and four loaded handguns. The charges against David Rodriguez were subsequently dismissed in light of the pending state charges. Rodriguez’s brother Eric Rodriguez was charged by complaint for drug trafficking and firearms charges, and has appeared before this Court.

violated the following federal criminal laws: RICO conspiracy in violation of 18 U.S.C. §1962(d).

(f) **Joshua Teixeira (a/k/a “Trouble”)** – Teixeira is a member of NOB, and there is probable cause to believe that he has been involved in numerous NOB-related crimes, including at least one gang-related attempted murder and drug trafficking. In recorded jail calls, Teixeira has conspired with other gang members to commit crimes as well as discussing gang-related topics. Teixeira has been in numerous NOB-related rap videos. As set forth below, there is probable cause to believe that Teixeira has violated the following federal criminal laws: RICO conspiracy in violation of 18 U.S.C. §1962(d) and conspiracy to distribute controlled substances in violation of 21 U.S.C. §846.

(g) **Joseph Gomes (a/k/a “Joey” or “J-Money”)** – Gomes is a member of NOB. Gomes has admitted in recorded jail calls to committing crimes on behalf of NOB, including committing violence against NOB rivals. Gomes has a gang-related tattoo, and has been observed wearing gang-related clothing. Based on the investigation, Gomes has been involved in two gang-related armed robberies. The second of these armed robberies included the theft of a vehicle, which was subsequently used in a February 2020 gang-related murder in Brockton, MA. As set forth below, there is probable cause to believe that Gomes has violated the following federal criminal laws: RICO conspiracy in violation of 18 U.S.C. §1962(d).

(h) **Alidio Barbosa (a/k/a “Ace Boogie” or “Ace”)** – Barbosa is a member of NOB. Barbosa’s participation in gang-related crimes has been discussed in recorded jail calls. In addition, Barbosa’s residence in Dorchester was used to facilitate gang-related activities for a period of time before Barbosa was arrested on state charges. As set forth below, there is

probable cause to believe that Barbosa has violated the following federal criminal laws:
possession of a firearm with an obliterated serial number in violation of 18 U.S.C. §922(k).

(i) **Samael Mathieu (a/k/a “Hamma” or “Hamma Thang”)** – Mathieu is a member of NOB and has been involved in NOB-related crimes, including drug trafficking and sex trafficking. Mathieu has a gang-related tattoo prominently displayed on his arm, has been involved in multiple NOB-related rap videos, and has also openly flashed gang hand signs. As set forth below, there is probable cause to believe that Mathieu has violated the following federal criminal laws: RICO conspiracy in violation of 18 U.S.C. §1962(d) and conspiracy to distribute controlled substances in violation of 21 U.S.C. §846.

(j) **Moses Cabral (a/k/a “Moe Money”)** – Cabral is a member/associate of NOB.³ Cabral has been involved in NOB-related crimes, including sex trafficking and drug trafficking. There is probable cause to believe that Cabral has violated the Mann Act on at least two occasions by trafficking women across state lines for the purpose of prostitution, and at least one of these occasions involved a minor victim. As set forth below, there is probable cause to believe that Cabral has violated the following federal criminal laws: RICO conspiracy in violation of 18 U.S.C. §1962(d); conspiracy to distribute controlled substances in violation of 21 U.S.C. §846; possession with intent to distribute controlled substances in violation of 21 U.S.C. §841(a)(1); and crossing state lines for the purposes of prostitution in violation of 18 U.S.C. §2421 (the Mann Act).

³ As an example of Cabral’s association with NOB, in May 2016, Cabral was living at an apartment house in Central Falls, Rhode Island which has been used as a residence (or claimed residence) by multiple NOB members/associates. In May 2016, a shooting occurred outside the apartment house. Investigating officers recovered evidence of the shooting, including a shell casing from Cabral’s apartment. Not only was the casing found in Cabral’s apartment, officers also recovered cocaine base (“crack”) and drug trafficking paraphernalia in the apartment.

(k) **Delven Carvalho-Centeio (a/k/a “Delly”)** – Carvalho-Centeio is a member of NOB. There is probable cause to believe that he has committed numerous NOB-related crimes, including drug trafficking and sex trafficking. Carvalho-Centeio has multiple gang-related tattoos, has openly flashed gang hand signs, and has been involved in NOB-related rap videos. As set forth below, there is probable cause to believe that he has violated the following federal criminal laws: RICO conspiracy in violation of 18 U.S.C. §1962(d); conspiracy to distribute controlled substances in violation of 21 U.S.C. §846; possession with intent to distribute controlled substances in violation of 21 U.S.C. §841(a)(1); and crossing state lines for the purposes of prostitution in violation of 18 U.S.C. §2421 (the Mann Act).

(l) **Darius Bass (a/k/a “Tre” or “Trigga Tre”)** – Bass is a member of NOB. There is probable cause to believe that he was involved in the attempted murder of a rival gang member on or about January 1, 2017. Investigators have recovered electronic communications related to NOB gang activity from a cellular phone used by Bass, as well as images of Bass and other NOB members/associates flashing NOB hand signs. Investigators have also recovered jail calls in which Bass discusses NOB-related activities. As set forth below, there is probable cause to believe that Bass has violated the following federal criminal laws: violent crimes in aid of racketeering in violation of 18 U.S.C. §1959(a)(3) and (a)(5).

(m) **Damian Cortez** – Cortez is a member/associate of NOB. There is probable cause to believe that Cortez has violated the Mann Act on at least one occasion by trafficking women with defendants Moses Cabral and Delven Carvalho-Centeio across state lines for the purpose of prostitution in violation of 18 U.S.C. §2421 (the Mann Act). There is further probable cause to

believe that Cortez possessed fentanyl with the intent to distribute it in violation of 21 U.S.C. §841(a)(1).

(n) **Anton Lopes (a/k/a “Ton Ton”)** – Lopes is a member of NOB. Lopes has been identified as being involved in gang-related criminal activity through recorded jail calls. On December 16, 2019, a handgun which was modified to fire automatically was recovered from Lopes’ residence along with fentanyl pills and drug trafficking paraphernalia. As set forth below, there is probable cause to believe that Lopes has violated the following federal criminal laws: possession with intent to distribute controlled substances in violation of 21 U.S.C. §841(a)(1); possession of a firearm with an obliterated serial number in violation of 18 U.S.C. §922(k); and possession of a firearm in furtherance of a drug trafficking crime in violation of 18 U.S.C. §924(c).

(o) **Brian Cardoso** – Pursuant to the investigation, Cardoso is a member of NOB. There is probable cause to believe that he was a felon in possession of a firearm in violation of 18 U.S.C. §922(g)(1).

PROBABLE CAUSE

I. NOB

6. Local and federal investigators (including BPD, ATF and FBI) have been involved in a federal investigation of NOB, and the Wendover street gang, since the summer of 2019. Both gangs originated in the Dorchester section of Boston. NOB is associated with the older Wendover gang. The investigation has established that members and associates of NOB are involved in various crimes, including, but not limited to, murders, attempted murders, armed robberies, drug trafficking, sex trafficking, and illegal firearms crimes. The crimes committed

by NOB members and/or associates have taken place in various communities in Massachusetts including, but not limited to, Boston, Randolph, New Bedford, Stoughton, Brockton, East Bridgewater, Taunton, and various communities on Cape Cod. Members and/or associates of NOB have also been involved in criminal activity in other states, including, but not limited to, Rhode Island, Maine, and Connecticut.

7. NOB members/associates have committed several violent crimes over the last approximately three years, including multiple murders and shootings. Many of these violent crimes have targeted rival street gang members, particularly members/associates of the Cameron Street gang.⁴ For example, two NOB members, including defendant Joseph Gomes, pistol-whipped and robbed a Cameron Street gang member/associate in public at the Shawmut MBTA station on or about October 8, 2017.⁵ Similarly, in February 2020, Joseph Gomes was involved in a jail call with a Wendover gang member/associate, who has significant ties to NOB. In the call, Gomes reported that the gang's violence was ongoing and targeted at removing any security threats to the gang. This call took place after at least two NOB-related murders targeting Cameron Street members/associates in early February 2020. Gomes told the Wendover member/associate that their rivals were "droppin' like flies." The two then discussed, in coded language, the fact that the older Wendover member/associate had trouble identifying Cameron Street members/associates for attack when he was previously on the street because of the number of new gang members/associates whom he did not recognize due to being incarcerated. The

⁴ Like NOB and Wendover, the Cameron Street gang originated in the Dorchester area.

⁵ Defendant Wilson Goncalves-Mendes subsequently posted on social media a video of the victim of the armed robbery being threatened and intimidated due to the victim's possible cooperation with law enforcement. This same video was also included in a gang-related rap video publicly released on or about May 1, 2020, in which defendant Michael Brandao used the video to threaten the victim again.

Wendover member/associate told Gomes: “[E]ven if I’m out fishing [targeting rival gang members], bro ... and I got my hook in the water my n***a ... I’m not gonna catch that fish, cuz I don’t know what these fishes look like bro. I don’t know what these fishes look like bro. These are all new fishes, bro” Gomes responded that they needed to be highly aggressive in committing violence. Still using coded language, Gomes stated: “[W]e livin’ in the ocean my n***a so ... n***a ... any fish is food! Any fish! Even if you think it’s friendly, you eat that fish, because n***as is f***in’ sharks, with a bunch of mothaf***in’ fish ... we sharks n***a. N***as ain’t fish over here, n***a, we sharks. So ... any fish” The Wendover member/associate raised the issue of being caught committing violence: “[Y]ou could be a piranha ... could be a piranha ... go on and take a bite out of everything ... or for a shark ... could take a bite out of everything ... but ... same time ... [unintelligible] n***a ... if you bite the wrong thing ... and then you ... you don’t make it back ... next thing you know....” Gomes responded: “*Nahhhhh! You bite everything! We bitin’ everything!*”

8. Assaults and gang-related intimidation have taken place at Massachusetts state courthouses and penal facilities. As an example of this type of violence, BPD gang investigators observed and intervened in a gang-related affray that took place at the Boston Municipal Court on or about October 28, 2019, after defendant Michael Brandao and another NOB member were confronted by rival gang members at the courthouse. Three NOB gang members/associates were involved in the affray, including defendants Joshua Teixeira and David Rodriguez. Similarly, investigators have identified a jail call in which Teixeira and other NOB members/associates, including defendant Ricky Pina, planned gang-related violence in penal facilities. During the call, Pina asked Teixeira about a member/associate of a different street gang who should have

been assaulted in custody. Teixeira responded that he was unaware that the individual was to be targeted, and noted later that the individual had aided Teixeira in assaulting a different gang member when Teixeira was in custody. Pina informed Teixeira that the target gang member, who was still incarcerated, had previously denigrated NOB through social media postings referring to a murdered NOB associate. Pina and Teixeira identified that defendant Brian Cardoso was incarcerated with the target gang member. It was agreed that Cardoso would be contacted to assault the target. Teixeira stated that he would tell Cardoso to “tray” the target – which has been interpreted as using a food tray to assault the target during a meal.

9. NOB members/associates have conspired to distribute, distributed, and possessed with intent to distribute, controlled substances including marijuana⁶, fentanyl, cocaine, cocaine base (“crack”), heroin and various types of prescription pills, including opioids. The fentanyl distributed by the gang involves not only fentanyl in powder form, but also fentanyl pills which have the appearance of oxycodone pills (fentanyl is a far stronger drug than oxycodone). These fentanyl pills have been recovered from defendants Ricky Pina and Anton Lopes.

10. NOB members/associates openly refer to themselves as being part of “NOB.” NOB members/associates also use certain numbers to denote their membership/association with the gang. For example, members/associates use the numbers “3” and “4” together to reference the gang, as well as the number “7981.” These gang-related numbers are openly used by gang members/associates including in: (1) gang-related hand signs; (2) gang-related tattoos⁷; (3) gang-related clothing; and (4) gang-related videos. NOB members/associates also refer to themselves

⁶ Based on the investigation, a percentage of the marijuana distributed by NOB members/associates has been imported from California.

⁷ For example, defendant Kelvin Barros has a tattoo with the number “7981,” while defendant Joseph Gomes has a tattoo with the numbers “3” and “4.”

as being part of the “Head Shot Mafia” and use the acronyms “HSM” or “H\$M.” In rap videos, NOB members brag that they are in the “Head Shot Mafia gang.” In one rap recording by defendant Samael Mathieu, he states: *“Always stay strapped [armed] b***h/You know that hamma thang with us/NOB and HSM that’s the only gang I trust/If you ain’t got no bodies on your belt, then you ain’t claimin’ us.”* The acronyms “HSM” or “H\$M” are used by gang members/associates to identify themselves in tattoos as well as in clothing. Defendants Delven Carvalho-Centeio and Samael Mathieu both have tattoos related to the Head Shot Mafia.

11. Members/associates use hand signs to identify themselves as being part of NOB. These hand signs include the use of “3” and “4.” Members/associates also use an inverted “H” hand sign (which can be done with one hand or two hands). NOB members/associates further use a team symbol of the Chicago Blackhawks hockey team to reference the gang. The symbol includes crossed tomahawks over the letter “C.” As noted above, one of the main rivals of NOB and the Wendover gang is the Cameron Street gang.

12. Members/associates of NOB have produced rap recordings and videos which are gang-related. The two primary members responsible for these recordings and videos are Michael Brandao and Kelvin Barros. For example, one of Brandao’s videos (released in 2019) is titled *Die Homes* – a direct reference to the Homes Avenue street gang, one of NOB’s rival gangs. The video includes express threats to shoot Homes Avenue gang members/associates, and was filmed on Homes Avenue as a means of disrespecting the rival gang. The video includes a simulated execution of a Homes Avenue gang member, as well as Homes Avenue gang clothing being lit on fire. The video also includes Brandao bragging that he targeted a Cameron Street gang member for violence and taunting Cameron Street through a reference to a murdered

Cameron Street member/associate. There are multiple other NOB gang members/associates involved in the video, including defendants Ricky Pina and Samael Mathieu. During the video, Brandao, Mathieu and Pina all flash NOB gang hand signs.

13. Rap recordings/videos are used to identify retaliatory violence committed by the gang as well as to memorialize NOB members/associates who have been either murdered or incarcerated. For example, in a video released on or about March 31, 2020, titled *This My City*, Brandao brags about acts of violence (including murders) committed by the gang and identifies members/associates who have been murdered (and for whom the gang has, and will continue to, retaliate).⁸ Similarly, Brandao and Barros were involved in a gang-related video released on or about May 1, 2020, titled *Dead Opps, Pt. 3*, in which other NOB members and defendants were involved, including defendants Delven Carvalho-Centeio, Darius Bass and Joseph Gomes. Several of the participants in the video, including Brandao and Barros, wear clothing bearing the gang symbol “H\$M” and flash gang hand signs. Brandao and Barros memorialize a murdered NOB member/associate, boast about gang-related violence and make gang-related threats. As discussed above, Brandao threatens the victim who had been pistol-whipped and robbed by two NOB members in 2017. On May 2, 2020, within approximately a day of the release of this gang-related video, defendants Brandao, Teixeira, Bass and Carvalho-Centeio were involved in a shooting at Teixeira’s residence in Dorchester, MA, in which they were targeted and, based on recovered evidence, Brandao shot back at the attacker.

⁸ The video includes various NOB members/associates, such as defendant Joseph Gomes. Various individuals flash gang signs in the video, and one individual wears a medical face mask with “HSM” and “3 4” handwritten on it.

II. VIOLENT CRIMES COMMITTED BY NOB

January 1, 2017 – Assault with a Dangerous Weapon/Attempted Murder

14. On or about January 1, 2017, NOB member Darius Bass and another NOB member/associate were involved in the attempted murder of John Doe 1 at his residence at 11 Howe Circle in Randolph, MA. John Doe 1 has been identified as a member/associate of the Cameron Street gang. At approximately 9:30 p.m., on January 1, the Randolph Police Department received a shots-fired call. The shooting occurred as John Doe 1 returned to 11 Howe Circle with his girlfriend. Investigators determined that at least five shots were fired from a 9mm pistol. Neither victim was struck by rounds. Responding Randolph Police officers recovered 9mm shell casings in the area of 14 Howe Circle, which is across the street from 11 Howe Circle. They also recovered a cell phone (without a case) and a stick of lip balm in the backyard of the residence consistent with them having been dropped during the shooting.

15. Less than twelve hours later, at approximately 8:30 a.m. on January 2, an individual reported to the Randolph Police seeing two suspicious persons near 14 Howe Circle. One person had climbed over the fence to access the backyard while the other person stayed on the other side of the fence and appeared to be acting as a lookout. Randolph Police officers immediately responded. Officers observed a male, subsequently identified as defendant Darius Bass, near the fence outside of the yard at 14 Howe Circle. When encountered by the officers, Bass was asked what he was doing. Bass (who did not live in Randolph but rather Dorchester) provided various evasive answers and acted in an evasive fashion.

16. Other officers encountered the other member/associate exiting the front of 14 Howe Circle. Like Bass, that individual was also not a resident of Randolph. The individual

told officers that he was taking a “shortcut.” He told one officer that he had driven to the location and left his car in the nearby high school parking lot. He thereafter told a different responding officer that he did not drive to the location. When confronted with this inconsistency, the individual repeatedly stated that he had not driven to the location. Given the circumstances (including the prior shooting), an officer did a pat-frisk and recovered a key fob for a vehicle. The officer left the individual with other officers and drove to the high school parking lot. At the lot, the officer used the key fob to identify a vehicle – a White Chevrolet Malibu.

17. From outside the vehicle, in plain view, the officer observed the individual’s ID on the passenger seat, a cell phone and an empty cell phone case. Both Bass and the other NOB member/associate were brought to the vehicle. Bass was asked if he knew the other person. He stated that he did not know the individual. The individual, in turn, stated that he did not know Bass.⁹ Both men were allowed to leave at that time, but the vehicle was impounded so that a search warrant could be obtained for the vehicle. A state search warrant was obtained that day for the vehicle and executed the next day. Officers recovered:

- a. multiple IDs for the other NOB member/associate;
- b. the cell phone which was subsequently identified as Bass’ phone;
- c. the empty cell phone case;
- d. a loaded .40 caliber pistol under the driver’s seat; and

⁹ On November 26, 2016, both men were stopped together (along with two other individuals, including another NOB member/associate) in a vehicle in Providence, Rhode Island. They were stopped by Rhode Island gang investigators due to concerns about potential violence involving NOB/Wendover and Cameron Street occurring at a club in Rhode Island. Officers recovered a .357 caliber handgun concealed in the vehicle.

- e. a loaded .45 caliber pistol under the passenger's seat.¹⁰

Bass' phone was subsequently searched through a state search warrant, and the following was recovered:

- a. images from rap videos involving Cameron Street gang members/associates, which included multiple images of the victim (which is consistent with Bass familiarizing himself with the appearance of the target for the shooting);
- b. MapQuest directions for 11 Howe Circle – the location of the shooting;
- c. an electronic communication sent within a few minutes of the shooting to an NOB member/associate which identified Bass' location on a map and that location was a short distance from the shooting site (which is consistent with Bass fleeing the shooting and seeking to be picked-up by an associate);
- d. internet searches starting at approximately 11:59 p.m. seeking information about shootings/crimes in Randolph and law enforcement actions in Randolph (which is consistent with Bass seeking information on the attempted murder and any following investigation);
- e. images of both Bass holding a gun and flashing a NOB hand sign, as well as images of other NOB gang members/associates, including Delven Carvalho-Centeio, flashing NOB gang hand signs;
- f. electronic messages taunting and threatening the Cameron Street gang, including referencing the murder of a well-known Cameron Street associate; and
- g. electronic messages from Cameron Street members/associates taunting and threatening Wendover/NOB.

The seized phone also included text messages consistent with Bass' membership in NOB.

Investigators recovered group texts, which included Bass and other identified NOB members and/or associates, discussing obtaining firearms for use by the group as well as discussing

¹⁰ The .45 caliber pistol has been matched through ballistics evidence to a gun used in a shooting on the UMass Dartmouth campus in late 2016. The shooting occurred in the vicinity of student housing. Recovered electronic communications from Bass' phone identified that Bass and other NOB gang members/associates were going to a party at UMass Dartmouth and that the "them kids" (referring to the Cameron Street gang) could be at the same location.

ongoing violence against the Cameron Street gang (including particularly the murder of a Cameron Street gang associate).

18. An analysis of cell site information for Bass' phone (obtained by state search warrant) showed:

- a. Bass' phone in the area of the shooting at around the time of the shooting;
- b. the phone then left the area;
- c. the phone returned to the area at approximately 11:30 p.m., approximately two hours after the shooting (which is consistent with trying to locate the dropped evidence); and
- d. the phone then left the area shortly thereafter.

The phone recovered from the location where the shots were fired at 11 Howe Circle was identified as belonging to the other NOB member/associate. The cell site information for that phone (obtained through a state search warrant) places the phone in the area of the shooting at around the time of the shooting. These facts are consistent with Bass being involved in the attempted shooting murder of John Doe 1 on or about January 1, 2017. The murder of a Cameron Street member, like John Doe 1, would have increased Bass' position in NOB because NOB values those members/associates who commit violence against gang rivals.

September 5, 2017 - Murder

19. On or about September 5, 2017, John Doe 2 was murdered at a barbershop on Stoughton Street in Boston. The victim has been identified as a member/associate of the Cameron Street gang. John Doe 2 had previously been shot in July 2017, two months before his murder. Based on ballistic evidence, the pistol used for this prior shooting was recovered from NOB member Alidio Barbosa's possession on or about September 11, 2017.

20. Based on the BPD homicide investigation, two individuals arrived on a scooter (a vehicle used by the gang as it can be driven to locations inaccessible by car). The individual on the back of the scooter walked into the barbershop and shot the victim multiple times. At the time of the murder, defendant Ricky Pina was on state court-ordered GPS monitoring, which provided information as to his location on the date of the murder. The GPS information identified that, in a short time period leading up to the murder, Pina drove past the area of the murder multiple times – consistent with conducting reconnaissance for the murder. On the first pass, BPD homicide investigators have identified evidence that Pina parked his car and surveyed the area around the barbershop on foot. Pina then drove to the area of the residence of defendant Michael Brandao, which was in Boston and near the murder site at that time. Based on the BPD investigation, during this initial drive, Pina was in contact with phones associated with Michael Brandao's sister and defendant Alidio Barbosa. Based on GPS information, Pina stayed at Brandao's residence for approximately three to four minutes before driving to the location of another NOB member/associate. Pina then drove around the area of the barbershop for a second time. After making that drive, Pina drove to a residence associated with the same NOB gang member/associate. Pina drove back to the area of the barbershop again around the time of the murder. After the murder, Pina left the scene in a route consistent with the murder vehicle. Pina's actions are consistent with his targeting the victim for the murder.

Firearm with an Obliterated Serial Number

21. Defendant Alidio Barbosa's residence at 12 Harlow Street in Boston was observed to be the central meeting place for NOB for a period of time following the murder of a well-known NOB associate in February 2017. Investigators have identified jail calls in which

NOB members/associates discussed that firearms had been removed from the murdered NOB associate's residence and distributed to other gang members/associates, including Barbosa. On or about September 11, 2017, BPD officers recovered a .40 caliber pistol which Barbosa had sought to hide from approaching officers by giving it to another individual. The .40 caliber pistol was placed into ATF's NIBIN system. NIBIN matched the ballistics from the handgun to eight separate shootings. The pattern of the shootings is consistent with NOB gang-related shootings, including multiple shootings involving Cameron Street gang members/associates.

22. A search warrant was executed by Boston Police officers at Barbosa's residence on or about September 18, 2017. Officers recovered two handguns wrapped in a t-shirt in a barrel outside of the residence. These handguns were (1) a Glock 9mm pistol with an obliterated serial number, which was loaded with 10 rounds of 9mm ammunition, and (2) a Glock .45 caliber pistol, bearing serial number XUA768, which was loaded with 9 rounds of .45 caliber ammunition. Officers also recovered the following from inside of the residence: (1) a medium and a small plastic bag of marijuana; (2) drug trafficking paraphernalia (including multiple digital scales and plastic bags); (3) miscellaneous rounds of ammunition; (4) \$1,000 in U.S. currency; and (5) documents in defendant Barbosa's name. Based on a review of the two Glock handguns by the ATF, both handguns were not manufactured in Massachusetts, and therefore had to travel in interstate or foreign commerce prior to the seizure. In addition, the Glock 9mm pistol has been matched through the ATF's NIBIN system to a shooting that occurred on or about August 22, 2017 in New Bedford, MA.

Armed Robbery on October 8, 2017 at MBTA Station

23. On or about October 8, 2017, MBTA police officers responded to a reported armed assault at the Shawmut MBTA station in Boston. Officers encountered a male victim (John Doe 3) who was bleeding from a head wound. The victim had been assaulted by two males, one of whom used a pistol to batter the victim. The two attackers had stolen various pieces of property from the victim, including his wallet. MBTA investigators were able to obtain video recordings from cameras in the Shawmut station which showed the two attackers beat and rob the victim. Investigators also identified witnesses to the armed robbery. One of the witnesses confirmed that one attacker had used a handgun to beat the victim while the other kicked the victim.

24. MBTA investigators were able to identify from the video that both suspects had GPS tracking bracelets on their legs. Based on information from these tracking devices, investigators were able to identify both attackers, including defendant Joseph Gomes. Both attackers have been identified as NOB members through the investigation. Defendant Gomes has been identified as a member of NOB through various means, including, but not limited to, recorded jail calls, and Gomes' participation in NOB-related rap videos. Investigators executed a state search warrant at an address used by Gomes, and recovered: (1) a handgun consistent with the one used in the armed assault/robbery; (2) bloody clothes consistent with clothes worn by Gomes during the armed assault/robbery; and (3) property consistent with the property stolen from the victim.

25. Based on the ongoing investigation, the victim was identified as a member/associate of the Cameron Street gang. Investigators have identified a video

subsequently posted on social media by defendant Wilson Goncalves-Mendes which shows the victim being intimidated for allegedly cooperating against Gomes and the other NOB member. This is the same intimidation video which was also used in the May 2020 NOB rap video to again threaten the victim as discussed above.

February 3, 2018 - Murder

26. On or about February 3, 2018, John Doe 4 was shot and killed in front of his residence by two individuals, who obscured their faces. Based on the BPD investigation, the two shooters approached from the area of an adjacent alley before they started shooting. The victim was shot multiple times. Per witnesses, prior to the murder, a vehicle (subsequently identified by investigators as a Chrysler Pacifica) was seen by the victim and others driving slowly past them – consistent with setting up a shooting. Witnesses told BPD investigators that the victim stated out loud that one of the people in the vehicle was “G Fredo” – the street name for defendant Michael Brandao. Per witnesses, the victim also identified the “kids” in the vehicle had “smoke” [a conflict] with the victim. The vehicle was observed by witnesses driving slowly to the area a second time. The shooting took place shortly thereafter.

27. Investigators collected various videos from the area and confirmed that the Pacifica was driving through the area. Based on the videos, investigators were able to identify that, prior to the murder, two persons exited the Pacifica while at least one more person was driving the vehicle. They could not identify the individuals from the videos. The two individuals walked directly towards the location of the murder. The videos support that the two ran back to the location of the vehicle after the murder and fled the area. Based on the investigation, the Pacifica was identified as a rental vehicle, and was rented by an identified

NOB member/associate. As set forth below, the NOB member/associate who rented the Pacifica was stopped less than two months later in a different vehicle with Brandao and two other NOB members/associates in circumstances consistent with the four going to do another gang-related shooting.

28. Less than six weeks after the murder, Brandao put out a rap video titled *They Don't Know*, which includes several other NOB members/associates, including the NOB member/associate who rented the Pacifica. In the video, Brandao references the murders of two NOB associates. Brandao further states that they got revenge for one of the murdered NOB associates, and notes that he “ran up and dropped a body.” The video also recreates a murder that shares the same circumstances as the murder of John Doe 4.

March 27, 2018 - Conspiracy to Commit Murder/Attempted Murder

29. On or about March 27, 2018, less than two months after the murder of John Doe 4, BPD gang investigators were monitoring Wendover/NOB and Cameron Street territories to prevent violence. As part of this surveillance, BPD gang investigators were conducting surveillance near Michael Brandao’s residence, which was in Quincy, MA, at that time. Officers observed Brandao get picked up in a SUV that was a rental vehicle. The vehicle proceeded to Boston. Officers observed the SUV drive to a residential neighborhood associated with the Cameron Street gang. The only viable reason for NOB members/associates to drive to the area was that it held potential targets for violence. Along these lines, by driving through Cameron Street territory, the NOB members/associates put themselves at considerable risk of being targeted for violence by Cameron Street members/associates. Officers also observed the vehicle engage in various driving moves consistent with “cleaning itself” of possible law enforcement

surveillance. Given all of the circumstances, the actions of the vehicle were consistent with the preparation for a shooting against the Cameron Street gang.

30. Officers attempted to stop the vehicle which fled at high speed. BPD officers pursued and lost the vehicle for a brief period of time before stopping it. Officers arrested the following individuals:

- a. the NOB member/associate who rented the vehicle associated with the February 3 murder was the driver;
- b. another NOB member was the front seat passenger;
- c. defendant Brandao was on the driver's side in the rear; and
- d. another NOB member was the other rear passenger.

31. Officers searched the area where pursuing officers had lost sight of the vehicle briefly. They found two handguns that had scratch marks consistent with being thrown from the vehicle – a .40 caliber pistol with a 16-round magazine lying next to it and a .380 caliber pistol. All four individuals in the vehicle had been in Brandao's video *They Don't Know* in which the murder of John Doe 4 was reenacted, and future, retaliatory murders were promised by NOB. During this video, all four individuals flashed NOB gang signs. The facts support that the individuals in the vehicle were in the process of committing a shooting targeting the Cameron Street gang when they were stopped by BPD officers.

May 17, 2018 – Conspiracy to Commit Murder/Attempted Murder

32. On or about May 17, 2018, defendant Joshua Teixeira and another NOB member/associate were found shot in a vehicle by BPD officers responding to shots fired. Officers determined that the shooting occurred on Winter Street in Dorchester – this area is aligned with the Cameron Street gang. BPD officers recovered video from the street where the

shooting occurred. Officers observed the vehicle in which Teixeira was a passenger pull up to the curb on Winter Street near a group of individuals standing together. Pursuant to the investigation, officers were able to identify that Teixeira was the back seat passenger of the vehicle. Per the video footage, Teixeira got out of the vehicle. Teixeira and at least two individuals in the group almost simultaneously began shooting at each other. Teixeira then fled the area in the vehicle. Ballistics recovered from the scene established that there were two shooters in the group of people, and that Teixeira was firing a 9mm pistol – multiple shots were fired by Teixeira. These facts are consistent with a gang-related shooting committed by Teixeira.

July 15, 2018 – Attempted Murder/Conspiracy to Commit Murder

33. On or about July 15, 2018, John Doe 5 was shot multiple times in New Bedford, MA. A witness identified an individual believed to be the shooter and provided a description of the individual to the New Bedford police. Investigators recovered security camera footage which showed an individual dressed in clothes similar to those identified by the witness. Investigators subsequently identified that the individual captured in the video had (1) a large arm tattoo consistent with defendant Wilson Goncalves-Mendes, and (2) the same general physical features as Goncalves-Mendes. Based on the investigation, Goncalves-Mendes is a close associate of defendant Kelvin Barros.

34. In 2019, investigators identified that a phone used by Goncalves-Mendes had been recovered from a vehicle used in a November 2018 shooting in New Bedford. A search warrant was obtained for the phone for the dates surrounding this shooting. The warrant resulted in the recovery of the following electronic communications:

- a. Two days before the shooting, Goncalves-Mendes communicated that he was in New Bedford with Kal (defendant Kelvin Barros' street name);

- b. The day before the shooting, Goncalves-Mendes communicated that he was in New Bedford with “Kal.” He also communicated that he was in New Bedford for “business.” Location data from the cellular phone placed him in New Bedford approximately 40 minutes after the second message;
- c. The day of the shooting, Goncalves-Mendes sent an electronic message that he was in “New Bedford tryn collect some bread;” and
- d. Cell location information for the phone associated with Goncalves-Mendes placed him in New Bedford at around the time of the shooting. After the shooting, there was an electronic message sent from the phone identifying that Goncalves-Mendes was “OMW [on my way] to Boston.”

The search of the phone also identified that, the day of the shooting (after the shooting), Goncalves-Mendes’ phone was used to conduct internet searches for information related to a shooting in New Bedford. The search of the phone further identified that, the day after the shooting, Goncalves-Mendes’ phone again had internet searches for information related to a shooting in New Bedford, as well as searches for information concerning an attorney.

August 12, 2018 – Attempted Murder/Conspiracy to Commit Murder

35. On or about August 12, 2018, in Stoughton, MA, local officers responded to a Mobil gas station for a reported shooting at approximately 3 a.m. On arrival, they observed John Doe 6 suffering from a gunshot wound to the hand. Based on the investigation of this shooting, including electronic communications seized from the victim’s phone, the victim was involved in dealing drugs with NOB members/associates, and actually delivered drugs to a location near defendant Michael Brandao’s residence at 80 Rodman Street in Quincy. Stoughton investigators identified that the victim also had been fronted drugs by NOB members/associates and had not paid for the drugs at the time of the shooting.

36. Investigators were able to obtain video of the shooting. Two individuals used a black Audi SUV to commit the attempted murder. The vehicle made two passes at the gas

station where the victim was shot. On the second pass, an individual got out and shot the victim. The wound is consistent with the shooter trying to shoot the victim in the head and the victim throwing up his hand to protect his head. Investigators have determined that the firearm used was a .357 caliber handgun.

37. Investigators determined that the black Audi used in the shooting was stolen from an auto body shop in Newton, MA, two days prior to the shooting – the Audi was one of multiple vehicles which were stolen from the lot. Shortly after the shooting, Stoughton detectives were contacted by the Quincy Police Department and were informed that one of the vehicles stolen from the Newton auto body shop had been located at 61 Trafford Street in Quincy. This location is close to 80 Rodman Street, defendant Michael Brandao's residence at that time.

38. On or about August 14, 2018, BPD officers observed the black Audi used in the Stoughton shooting parked and unattended on Harlow Street in Dorchester – this location is NOB territory. The vehicle was towed by Stoughton police and a search warrant was executed. A black backpack with personal papers in the name of defendant Wilson Goncalves-Mendes was located in the car. Several rounds of .45 caliber ammunition were also recovered from the backpack. A soda bottle was recovered from the rear passenger door of the vehicle. In September of 2019, investigators learned that DNA taken from the soda bottle matched the DNA profile of defendant Goncalves-Mendes.

39. Investigators were able to access the onboard system on the Audi and identified that three calls were made through the onboard system by a person using a burner phone. The calls started at approximately 8:51 p.m. the night before the shooting – the shooting took place at 3 a.m. The first two calls were made to a phone used by NOB member Darius Bass (as set forth

above, there is probable cause to believe that Bass was involved in a gang-related attempted murder on or about January 1, 2017). The third call was made to a phone associated with Goncalves-Mendes.

40. Stoughton Police investigators subsequently recovered electronic communications from Goncalves-Mendes' phone recovered per a shooting in New Bedford in November 2018. There are communications from the night before the attempted murder in which Goncalves-Mendes communicated that he was at "Fredos" – Michael Brandao's residence. Investigators also reviewed Goncalves-Mendes cellular site data from the night of the shooting and discovered that Goncalves-Mendes was in the area of Brandao's residence the night prior to the shooting.

November 21, 2018 – Attempted Murder/Conspiracy to Commit Murder

41. On or about November 21, 2018, John Doe 7 was shot several times near a residence in New Bedford. Multiple .40 caliber shells were found in the area of the shooting. A Massachusetts State Police Trooper was in the area of the shooting and observed two individuals fleeing the area in a grey vehicle. The trooper followed the vehicle, but lost it during a high-speed chase. The vehicle, a Nissan Altima, was subsequently found abandoned with the keys in the center console and a cellular phone that was continuously ringing. The phone was identified as being used by Goncalves-Mendes. Near the vehicle, officers recovered an extended magazine for a .40 caliber pistol – this is the caliber of pistol used in the attempted murder. This vehicle had been stopped earlier in the night by MSP in the Boston area – the driver was identified as defendant Goncalves-Mendes.

42. The vehicle was reported stolen by a female identified as defendant Kelvin Barros' girlfriend. Barros' girlfriend was interviewed by officers, and stated that the vehicle had

been in the possession of her friend Wilson Goncalves-Mendes before it was allegedly stolen.

The female became evasive during the interview and stated that she did not know how to get into contact with Goncalves-Mendes, despite letting him drive her car. Per Barros' girlfriend, Goncalves-Mendes got the vehicle in Dedham, MA, on the day of the shooting.

43. A search of the recovered cellular phone identified a message sent on the day of the shooting which states: "I'm tryn' get this lick in New Bedford" – "lick" is street slang for an act of gang violence. The cell phone data places the phone in the area of the shooting at the time of the shooting.

July 14, 2019 – Murder

44. On or about July 14, 2019, at approximately 2 a.m., BPD officers encountered a group of people partying outside of defendant David Rodriguez's residence at 77 Alexander Street in Dorchester. The group included defendants Ricky Pina, Joshua Teixeira, Darius Bass and another well-known NOB member. As set forth herein, Pina, Teixeira, and Bass have been involved in violent crimes on behalf of NOB, as well as drug trafficking.

45. At approximately 11:37 p.m. on July 14, Boston Police officers responded to a call for a person shot on Columbia Road at Stoughton Street in Dorchester. Upon the officers' arrival, they located a victim suffering from an apparent gunshot wound to his head. The victim, John Doe 8, was transported to the Boston Medical Center where he was later pronounced dead.¹¹ The scene was processed by members of the BPD. A video canvas of the area revealed several surveillance cameras in the area. Video was recovered from several locations.

¹¹ John Doe 8's twin brother was murdered on February 8, 2020 in Brockton, MA – based on the investigation, this murder was also NOB-related. A vehicle used in the Brockton murder was stolen in an armed robbery in Boston. Investigators have identified that David Rodriguez along

46. Based on the investigation, BPD detectives determined that a sedan pulled up next to the victim and another individual, who were on scooters at a light at the corner of Stoughton Street and Columbia Road. An individual from the vehicle shot and murdered the victim before fleeing at a high rate of speed. The vehicle used in the murder was identified as being a Toyota Camry or Corolla, 2006 to 2008-year model, black or gun metal gray.

47. Based on the investigation, David Rodriguez was identified driving a dark-colored Camry consistent with the murder vehicle and parking the vehicle outside the Dublin House restaurant earlier that night, before the murder. Rodriguez has been identified getting out of the vehicle by investigators based on video surveillance footage. Rodriguez left the area in his vehicle. Later that night, a sedan, which appears to be Rodriguez's vehicle, arrived and parked in the same spot as earlier, though no one exited the vehicle. Based on surveillance video, a male (who has been identified) is observed, carrying two white plastic bags, walking from the Dublin House restaurant towards a different vehicle. The male hands one plastic bag to the woman in that vehicle before walking across Stoughton Street and handing the other plastic bag to the driver of the sedan. The male stands on the street talking to the driver of the sedan for approximately 40 seconds before the victim and the other individual ride past on their scooters. The male standing on the street reacts and points towards the scooters. The sedan then pulls out onto Stoughton Street, stops, and the driver hands an object to the male. The object appears to be rectangular in shape and light can be seen reflecting off of it – consistent with a cellular phone. The sedan then travels in the direction of Columbia Road, the same direction as the scooters.

with other NOB members (including Joseph Gomes) were involved in the robbery, and were video-recorded pawning jewelry that was also stolen during the armed robbery.

48. The exterior surveillance footage from a different location was examined, and showed that the driver of the sedan shot the victim at the street light as the victim was waiting for the light to change. The sedan then pulls away at a high rate of speed across the intersection onto Dudley Street with no headlights on. Based on security camera footage, the sedan can be seen travelling up Dudley Street with no lights on at a high rate of speed, before it turns left on Folsom Street. The vehicle is thereafter lost in the neighborhood. At that time, David Rodriguez lived on Alexander Street which is a few streets over from Folsom Street.

49. Investigators have been able to identify the male to whom the object was passed as well as the phone number associated with his phone. Investigators were also able to identify a telephone number used by David Rodriguez. A cross-check of the records between the two identified phones revealed that there were approximately 14 instances of contact, both voice calls and electronic messages, between the two telephone numbers between July 14, 2019 and July 21, 2019. On July 14, 2019, around the time of the murder, the two telephone numbers communicated with one another at: (1) 11:16p.m.; (2) 11:21p.m.; (3) 11:27p.m.; (4) 11:28p.m.; and (5) 11:30p.m.

50. Investigators sought and obtained a search warrant for cellular tower location information for the two cellular phones at the time of the murder. Based on an analysis by the FBI, both cellular phones (including David Rodriguez's) were in the immediate area of the homicide at the time of the homicide. In addition, per the analysis, the cellular tower in the immediate area of the homicide that captured the phones is a DAS cellular tower, which has limited coverage areas. This would mean that both phones would have been close to the tower in order to utilize the tower.

September 12, 2019 – Hobbs Act Robbery Conspiracy

51. Per recorded jail calls, on or about September 12, 2019, defendant Ricky Pina (who was incarcerated) spoke to an individual who was working with Pina and other NOB members/associates to deal drugs. The drug dealer (who was not a member of NOB) had been recruited by Pina to help support Pina's drug business while Pina was incarcerated. The dealer told Pina that he had been robbed by individuals and he believed that the robbery was an "inside" job. It was believed that one of their drug sources had been involved in targeting the dealer for robbery. The two agreed to meet in person to further discuss the issue.

52. The next day, Pina had a recorded call with defendant Joshua Teixeira. In the call, Pina identified that the dealer had been targeted and robbed. Pina told Teixeira that they needed to respond to the robbery. Teixeira demurred that the dealer was not a member of NOB, and they therefore should not commit violence against a drug source for a non-member. Pina responded that they needed to ensure that their organization was not subject to being targeted. Teixeira agreed. Pina and Teixeira discussed the implications of retaliating against one of the gang's drug sources. The two agreed that violence should occur only after they had robbed the drug source for as much product as they could. The two agreed that, after the robbery, the drug source could be taken out.

February 2, 2020 – Armed Robbery

53. On or about February 2, 2020, in the early morning, police responded to a shots fired report in Dorchester. Shortly thereafter, a victim claimed that his vehicle had been stolen by four males at the location of the shots fired; two of the men had been armed. This vehicle was subsequently recovered after it had been set on fire. Based on an initial review of evidence

by investigators, the stolen vehicle had been used by two shooters in the murder a male victim in Brockton on February 8, 2020. The victim was the twin brother of John Doe 8, who was shot and killed on July 14, 2019.

54. Based on recorded jail calls, defendant Joseph Gomes admitted to being involved in the armed robbery of the vehicle. In one call with defendant Joshua Teixeira, Joseph Gomes bragged about robbing the victim for his jewelry and his vehicle. Gomes further stated that he had committed the robbery because of money owed to the gang. In other jail calls, Gomes identified that they had pawned the victim's jewelry at a specific pawn shop in Boston. Investigators have recovered the paperwork and video surveillance footage from the pawn shop. Defendant David Rodriguez was the person who pawned the jewelry and he was accompanied by Joseph Gomes and another NOB member/associate. All three are clearly recorded entering and leaving the pawn shop.

III. Drug Trafficking

November 4, 2017 - Cocaine

55. On or about November 4, 2017, BPD's Drug Control Unit was conducting surveillance in an area in Dorchester where there had been numerous recent drug-related arrests. Officers observed a red Chevrolet Silverado occupied by a single, white male driving in a suspicious manner. After running the license plate, it was determined that the vehicle was registered to a male residing in Scituate, MA. Officers observed the car driving around, stopping and parking for a short time, and driving around and then parking again. While watching the Silverado, officers observed a black Dodge Durango approach the Silverado and park directly in front of it.

56. Officers then observed the driver of the Durango, later identified as defendant Delven Carvalho-Centeio, get out of the Durango, walk to the Silverado and get into the front passenger seat where he remained for approximately 30 seconds. Carvalho-Centeio exited the Silverado and re-entered the Durango. Both vehicles were observed driving away in opposite directions. These circumstances were consistent with a street-level drug deal. As a result, officers pulled over the Silverado while other officers followed the Durango. When approached, the driver of the Silverado immediately raised his hands and blurted out “[i]t’s in my socks, it’s in my socks!” After being advised of his *Miranda* warnings, officers asked the driver what was in his socks and he stated that he just purchased powder cocaine from the male that had entered and exited his car. Officers recovered a plastic bag of white powder from the driver’s sock. According to the driver, he had purchased a “half ounce” of cocaine and had given the male who got into his car \$600 (a single \$100 bill and the rest in \$20 bills).

57. As the driver of the Silverado was being questioned, other officers stopped the Durango. Officers observed what appeared to be a black rifle on the rear passenger seat. The driver was identified as defendant Carvalho-Centeio and the passenger as defendant Moses Cabral. The gun on the back seat was determined to be a large paintball gun that resembled an assault rifle. Both defendants were arrested. During a search incident to arrest, Cabral was found to be in possession of \$603 in one pocket and \$20 in the other pocket. This consisted of a single \$100 bill and the remainder in \$20 bills, along with three single dollars.

February 1, 2018 - Cocaine

58. On February 1, 2018, Kelvin Barros was stopped by BPD gang investigators in a vehicle with a female driver. When Barros was pat-frisked, officers felt a large, hard object

hidden in Barros' pants. Barros admitted that it was drugs. Officers recovered approximately 125 grams of powder cocaine hidden on Barros' person during the stop. This amount of cocaine is consistent with distribution.

December 17, 2018 – Cocaine Base (“Crack”)

59. On December 17, 2018, Kelvin Barros was observed in a vehicle with Sean “Shizz” Brown in East Bridgewater, MA.¹² Officers observed a known drug abuser approach the vehicle and conduct what appeared to be a drug deal. The vehicle was stopped to investigate. While the stop was ongoing, officers approached the drug abuser who admitted that he had purchased opiates from the driver of the vehicle – identified as Brown. The customer informed officers that he had observed Brown with cocaine base (“crack”) on his lap. Both Brown and Barros were arrested based on the circumstances. Officers found that Brown had approximately an ounce of cocaine base hidden on his person. \$1,200 in cash was seized from the center console of the car. Barros had \$598 on his person in cash.

Drug Trafficking Conspiracy 2019

60. Based upon seized electronic communications from multiple phones and recorded jail calls, Barros, defendant Samael Mathieu and others conspired together to distribute controlled substances and to engage in prostitution activities (with Barros and Mathieu acting as pimps/protection in the sex trafficking conspiracy). The NOB members used female coconspirators, not only in regard to prostitution activities, but also to support their trafficking of various types of controlled substances including fentanyl pills (as set forth herein, fentanyl pills have been recovered from other NOB members, including defendants Ricky Pina and Anton

¹² Brown is presently charged in this District with drug trafficking and firearms charges based, in part, on the East Bridgewater incident.

Lopes). In seized electronic communications from the fall of 2019, one of the female participants in this conspiracy (who was involved in both prostitution and drug trafficking) identified monies owed to Barros for drug trafficking activities conducted by her and other associates. For example, on or about September 13, 2019, the female coconspirator communicated with Mathieu after receiving drug proceeds, and informed Mathieu that she was “bout to go see Kal” [Barros]. When Mathieu asked her why she was meeting with Barros, she responded “to pay him why else.” On or about September 26, 2019, the same female coconspirator discussed drug proceeds with an associate. She told the associate that “anything after 520 is Kal money.” Investigators have also recovered electronic communications indicating that proceeds generated by drug trafficking were electronically transferred to an account associated with Barros by this female coconspirator. In addition, in late September 2019, the same female coconspirator communicated with others regarding Barros obtaining a location to conduct sex trafficking, and that Barros was to be paid for “protection.”

April 26, 2019 - Marijuana

61. On April 26, 2019, defendant Delven Carvalho-Centeio was arrested with approximately 126 grams of marijuana packaged for sale (per the investigation, a significant source of income for the gang is marijuana sales) based on a state search warrant for his person. When his residence was searched per a search warrant, officers recovered additional marijuana, trafficking paraphernalia, a Glock magazine with 15 rounds of .357 ammunition, an empty Glock magazine, a Glock magazine loader, and 71 rounds of ammunition.

July 20, 2019 - Fentanyl and Loaded Handgun

62. On July 20, 2019, BPD officers attempted to conduct a traffic stop of a vehicle with no front plate and heavy window tint. The vehicle was identified as being registered to Ricky Pina. Pina's vehicle then accelerated beyond the speed limit and took numerous turns. The officers were able to stop the vehicle. Despite requesting that the windows of the vehicle be rolled down, the windows were kept up. The officers then had to open the rear passenger seat and order that the windows be rolled down. At that point they identified that Michael Brandao was in the passenger seat and Pina was the driver. Based on security concerns, officers conducted a pat-frisk of Pina and Brandao as well as a search of the passenger compartment.

63. Officers located a plastic bag with 9 blue pills in a driver's side AC vent. Below the pills officers found a Smith & Wesson, M&P Shield 2.0 pistol with an obliterated serial number. The gun was loaded with 9 rounds of ammunition with one in the chamber. The pills are consistent with the type of fentanyl pills distributed by NOB – similar pills were recovered from NOB gang member Anton Lopes. Based on a NIBIN review by the ATF, the recovered handgun was used in a prior shooting on Trull Street in Boston (no injuries were reported to BPD) – this is a street where NOB/Wendover members/associates have committed shootings targeting the Cameron Street gang.

Pina Jail Calls Regarding Drug Trafficking

64. After the above arrest, Pina was held. Pina, in jail calls to his brother, worked to maintain his role in the NOB/Wendover drug distribution network. Pina told his brother where his drugs and money were hidden and listed people that owed him money and people that were owed money. Pina instructed his brother on ways to get in contact with several drug customers

and suppliers. Ricky Pina emphasized on several occasions that his Android and iPhone cellular phones, at the time held in his property in the jail, would help connect his brother with his drug connections. In calls, Pina informed his brother that there was “a lot of money on that phone” and suggested sharing the contacts with the NOB members/associates. In a later call to Joshua Teixeira, Ricky Pina instructed him to take the Android phone and to give his brother the iPhone. On almost every call to his brother, Pina gave explicit instructions on how to maintain the drug network. Shortly after his incarceration, Pina also connected with a non-gang affiliated drug dealer, who agreed to work with Ricky Pina in the drug organization. In calls, the dealer¹³ was given instructions by Pina, and the dealer, in turn, updated Pina with the network’s status.

Mathieu Drug Trafficking Communications June to September 2019

65. As discussed above, based on various recovered communications, defendant Samael Mathieu was involved in a gang-related conspiracy to distribute drugs with defendant Kelvin Barros and Sean Brown, as well as conspiring to engage in sex trafficking activities. Mathieu was arrested by MSP troopers in Taunton, MA, on or about October 1, 2019. During this arrest, drugs (marijuana and oxycodone pills) and approximately \$2,000 in cash were recovered from Mathieu’s person. At a Taunton residence used by Mathieu, troopers recovered: (1) various other drugs (including oxycodone pills, fentanyl, and suboxone); (2) two loaded handguns; and (3) drug trafficking paraphernalia.

66. Based on this arrest, two phones were seized from Mathieu by the MSP troopers. Several thousand electronic communications were recovered from one of the phones for a period from June 2019 through approximately the time his arrest. In these messages, Mathieu and other

¹³ This is the same dealer who triggered the Pina/Teixeira conspiracy to rob one of the gang’s sources of supply as discussed above.

coconspirators (including female coconspirators) openly communicate about dealing various controlled substances (including cocaine, cocaine base, heroin, fentanyl, suboxone and marijuana) in various cities in Southern Massachusetts as well as on Cape Cod. The communications include: (1) soliciting customers for drug deals; (2) arranging for transactions; (3) coordinating transactions; and (4) discussing forms of payment, including trading firearms or other property for drugs. For example, in communications on or about September 16, 2019, a customer on Cape Cod told Mathieu that his/her girlfriend's mother had "found that shit [the drugs provided by Mathieu] and flushed it" because the drug customer had been in a bathroom for 3 hours after using the drugs. The customer further stated that if the woman did not repay him/her for the flushed drugs: "I'm stealing everything from this bitches [sic] house ... she has a brand new MacBook ... [and] TVs." As another example, in communications on or about September 11, 2019, a drug customer offered a "strap" [handgun] for drugs. The customer communicated that he/she had "a couple different ones." Mathieu responded that "I need a strap" and "As many as possible." In another of the seized communications, Mathieu noted that he was with "Kal" (Barros) and "Shizz" (Sean Brown).

67. The seized communications also involved activities related to prostitution in which Mathieu's phone was used to set-up meetings for the purpose of prostitution. In one of the seized communications, prices for sex acts were provided to a potential customer. In other communications from Mathieu's phone, customers were checked to ensure that they were not members of law enforcement. Also, investigators have recovered evidence which establishes that sex trafficking activities involving this group were supported through the use of internet advertisements.

October 31, 2019 – Recovery of Drugs and Drug Proceeds

68. On or about October 28, 2019, defendant Michael Brandao and another NOB member were scheduled to begin trial on firearms charges in Boston Municipal Court. BPD officers were on hand at the courthouse for security purposes. Officers observed that, while in court, the other NOB member was confronted by a rival gang member and other individuals. During the confrontation, which was escalating towards violence, Brandao was observed making phone calls from a cellular phone. Shortly thereafter, Joshua Teixeira, David Rodriguez and another NOB member/associate arrived at the courthouse and engaged in a physical confrontation. Teixeira was subsequently arrested for the affray.

69. Following this arrest, Teixeira called NOB gang members/associates from jail (in coded calls) to recover marijuana, money and other contraband that Teixeira had at his residence. On or about October 31, 2019, various NOB gang members/associates were observed by law enforcement going to Teixeira's residence to remove the drugs, money and other contraband – Brandao was one of them. In recorded jail calls, Brandao (as well as other gang members) can be heard talking to Teixeira from within Teixeira's residence as they attempt to recover the contraband. In fact, Brandao's street name "Fredo" is mentioned in the call and his voice has been identified by officers with experience dealing with Brandao.

70. Officers subsequently observed the various gang members leave the residence and then speed away in various vehicles. Officers were able to stop some NOB gang members/associates, including Brandao. The officers recovered significant quantities of marijuana, and cash from two gang members (each had approximately \$2,000 – the cash was not seized). The seizures did not involve Brandao. Following the seizure, Teixeira was recorded in

a jail call complaining that he had lost his marijuana to the police.

December 16, 2019 – Seizure of Fentanyl and Loaded Handgun

71. On or about December 16, 2019, BPD and the Quincy Police Department executed a search warrant for the residence of NOB member Anton Lopes located in Quincy, MA. The following items were seized from the location where Lopes was living:

- a. a black shoebox containing a Glock firearm box, a black plastic holster, three 9mm Glock magazines, one .357 caliber high-capacity Glock magazine, one loaded Smith & Wesson magazine, assorted rounds of ammunition and a black speed loader;
- b. an M&P Bodyguard gun box containing paperwork in Lopes' name;
- c. a plastic bag containing eight (8) blue pills which field-tested positive for fentanyl, (these pills are consistent with the type of fentanyl pills recovered from defendants Ricky Pina and Michael Brandao as discussed above); a glass jar filled with marijuana and numerous ID cards in Lopes' name;
- d. a Burberry bag containing \$3,285 in United States currency; and
- e. a Glock 21, .45 caliber pistol, with an obliterated serial number, and loaded with 13 rounds of .45 caliber ammunition including a round in the chamber – the handgun was found hidden in the drop ceiling of Lopes' room.

The pistol recovered from Lopes had an “auto-sear” switch which converts a pistol into an automatic weapon by causing the continuous discharge of rounds from a single trigger pull. The “auto sear” switch was operational per analysis by the ATF. Based on a review of the Glock pistol by the ATF, the pistol was not manufactured in Massachusetts, and therefore had to travel in interstate or foreign commerce prior to the seizure.

February 19, 2020 – Seizure of Drugs, Proceeds and Four Loaded Handguns

72. Beginning in the summer of 2019, BPD investigators were able to observe activities taking place at two locations in Dorchester associated with NOB members/associates

David and Eric Rodriguez - 1 Oleander Street (Eric's residence) and 77 Alexander Street (David's residence). Through use of the pole cameras and ongoing surveillance, investigators determined that David Rodriguez had access to 1 Oleander Street, and, in fact, had a key to 1 Oleander Street that he was observed using to regularly enter the residence. These observations led up to the execution of federal and state search warrants on or about February 19, 2020.

73. Over approximately seven months leading up to the execution of the warrants, investigators observed multiple instances of conduct consistent with drug transactions taking place at both 77 Alexander Street and 1 Oleander Street. David and Eric were regularly observed going into each other's residences at various hours of the day and night. On multiple occasions, officers observed vehicles stop in the area of 77 Alexander Street and have very brief interactions with David Rodriguez, who met them on the street. Similarly, on multiple occasions, investigators observed vehicles pull-up near 1 Oleander Street. Investigators observed either the driver or an occupant of the vehicle enter 1 Oleander Street, spend a very brief time in 1 Oleander Street, and then leave the area. These interactions are consistent with drug trafficking taking place at 1 Oleander Street – a location that David Rodriguez frequented on a nearly daily basis. In addition, on numerous occasions over this same time period, investigators observed David and Eric Rodriguez leaving together in the same vehicle, with Eric carrying a backpack.

74. On or about February 19, 2020, federal and state search warrants were executed at 77 Alexander Street and at 1 Oleander Street, in the early morning. Upon entry into 77 Alexander Street, David Rodriguez was located in a bedroom and taken into custody pursuant to a federal arrest warrant. During the execution of the warrant, the following items consistent with

drug trafficking were located: (1) multiple bags of different sizes containing varying amounts of marijuana (4 bags containing approximately 38 grams, 3 bags containing approximately 167 grams, and one bag containing approximately 500 grams); (2) a digital scale; (3) three boxes of Glad plastic sandwich baggies (over 500 bags) (these baggies are consistent with packaging drugs for street-level distribution); (4) \$5493 in US currency; and (5) loose pages containing information consistent with a drug ledger. Ledger pages with a similar appearance were found in a notebook seized from 1 Oleander Street.

75. On the same date, as law enforcement was entering the premises at 1 Oleander Street, an officer observed an individual attempt to drop a handgun from a window on the second floor – Eric Rodriguez was the only occupant of 1 Oleander Street at the time of the execution of the search warrant. The handgun was a Springfield Armory .45 caliber pistol, which was loaded and had a round in the chamber. Officers also recovered three more handguns from a closet located on the first floor in a box. All three handguns were loaded and had a round in the chamber. These handguns included one Smith & Wesson pistol and two Glock pistols. In addition, officers recovered the following items consistent with drug trafficking from the second floor: (1) 14 marijuana plants; (2) a digital scale; (3) a large heat sealer consistent with the packaging of bulk controlled substances; and (4) two bundles of US currency totaling approximately \$2000, consistent with drug trafficking proceeds. From the first floor, officers recovered: (1) multiple bags of different sizes containing varying amounts of marijuana (one bag containing approximately 266 grams, 2 bags containing approximately 8 grams, and one bag containing approximately 27 grams); (2) a digital scale; (3) extra-large plastic bags consistent with the packaging for bulk quantities of marijuana; (4) one box of Glad plastic sandwich

baggies, which were recovered next to the digital scale, consistent with street-level drug trafficking; and (5) a green spiral notebook with lined pages containing names and monetary sums, consistent with a drug ledger. The ledger pages in the notebook have similar appearance to the ledger pages seized from 77 Alexander Street. The ledger pages included a reference to a payment being made to NOB members Ricky Pina and Joshua Teixeira. In addition, investigators have identified an electronic communication in which David Rodriguez and Ricky Pina discussed a drug source.

Fentanyl Trafficking in 2020

76. Investigators conducted surveillance of defendant Delven Carvalho-Centeio in early 2020. Based on the surveillance, Carvalho-Centeio had numerous encounters with individuals indicative of drug distribution activity, both meeting individuals for drug “re-ups” and sales of drugs to drug users. On one such occasion, in January 2020, Carvalho-Centeio was observed conducting what appeared to be a street-level drug deal with a suspected drug user. Officers stopped the buyer and recovered a substance consistent with a controlled substance – the buyer informed officers that it was fentanyl. The buyer confirmed to officers that he/she purchased the drugs from Carvalho-Centeio. The same buyer was intercepted by officers again in March 2020, and a substance consistent with a controlled substance was recovered on that occasion as well. The buyer agreed to meet Carvalho-Centeio days later accompanied by a BPD undercover officer. During this meeting, which also occurred in March 2020, the buyer and the undercover officer met Carvalho-Centeio. The buyer paid Carvalho-Centeio money owed from the previous transaction. The undercover officer engaged Carvalho-Centeio in conversation, and they agreed to meet at a later date to conduct a purchase of drugs from Carvalho-Centeio.

April 28, 2020 – Possession of Fentanyl

77. On April 28, 2020, Brockton Police detectives were on patrol when they observed a white 2020 Chevrolet Malibu travelling in front of them. The detectives attempted to conduct a traffic stop of the Malibu, but the driver refused to pull over and sped away at a high rate of speed. The chase continued until the Malibu struck a parked vehicle. The driver of the Malibu fled the accident on foot. Brockton Police responded, but were unable to locate the suspect. The detectives returned to the crash and conducted a search of the Malibu. During the search, they located a prescription bottle in the name of Damian Cortez inside the car. A check with the Commonwealth of Massachusetts Registry of Motor Vehicles license photo database was conducted, and the detectives identified Damian Cortez as the male they observed running from the Malibu. Several other items were recovered from the vehicle, including two cellular phones. The following day, on April 29, 2020, a Brockton detective responded to a residence in Brockton where a resident had discovered a bag of off-white powder in his/her driveway. The detective noted that the location where the bag was found would have been in Cortez's flight path as he ran from the crashed Malibu the previous day. The bag, which was seized by law enforcement, contained approximately 18 grams of fentanyl.

78. Investigators took custody of the two cellular phones recovered by the Brockton Police and, after obtaining federal search warrants for the phones, recovered evidence from one of the phones that Cortez was engaging in frequent drug transactions. Many of Cortez's text messages were sent to drug suppliers, in efforts to obtain narcotics, and to buyers, in efforts to re-distribute narcotics. Many of these messages contained efforts to pay and collect drug debts from various individuals. In messages in mid-March 2020, Cortez communicated with a NOB

member about obtaining marijuana. In addition, investigators also have identified numerous communications between Cortez and defendant Moses Cabral. Included were communications between Cortez and Cabral, dated April 28, 2020, which support that, prior to being involved in the aforementioned hit and run, Damian Cortez had met with Cabral and “re-upped,” acquiring from Cabral the fentanyl found abandoned in the driveway along Cortez’s flight path the following day.

May 6, 2020 – Drug Trafficking

79. On or about May 6, 2020, investigators conducted surveillance of Goncalves-Mendes’ residence and observed what appeared to be a street-level drug transaction take place at the residence. Goncalves-Mendes is presently held in home confinement on state charges. On or about May 7, 2020, Goncalves-Mendes conducted a recorded jail call with defendant Ricky Pina. Though the two used coded language, investigators determined that Goncalves-Mendes was seeking to engage in drug trafficking activities with Pina (who has continued his drug trafficking activities through coconspirators on the street). In support of this working relationship, in coded language, Goncalves-Mendes expressed to Pina that he had made \$50,000 by trafficking controlled substances while on home confinement.

IV. SEX TRAFFICKING CRIMES

April 25, 2017 Attempted Sex Trafficking of a Minor

80. On or about April 25, 2017, law enforcement in New Haven, CT, received information that two sisters, one a 16-year-old, were being held against their will at the Days Inn located at 270 Foxon Boulevard in New Haven. The older sister, 18-year-old KL had sent a text message to a person that she and her 16-year-old sister KB were being held at the Days Inn by a

pimp they knew as “Moe-Money,” later identified as defendant Moses Cabral, who was arranging for them to engage in sexual acts for a fee. This individual contacted the victims’ Massachusetts DCF worker who immediately notified law enforcement.

81. An immediate police response was initiated based on the fear that the victims’ safety may be in jeopardy. Although defendant Moses Cabral had left the area before law enforcement arrived,¹⁴ the victims were quickly recovered at the hotel. Law enforcement determined that KB had been listed as a missing runaway out of Massachusetts. According to the victims, who were interviewed separately, KL and KB were staying at the Dorchester home of another male who was acting as their pimp. On or about April 24, 2017, Cabral, using the screen name “Moe-Money,” made contact with KL via a Backpage.com ad posting the victims’ prostitution services. Cabral assured KL that if the victims’ went with him, he would take care of them and assist them with making money. The victims agreed. Cabral and another unidentified male picked them up in a black SUV.

82. Cabral drove them from Dorchester, MA, to New Haven, CT, arriving late on the night of April 24, 2017. Cabral instructed KL to get a room for one night, which she did, paying in cash. According to both KL and KB, Cabral immediately began posting prostitution ads of the victims on Backpage.com, using KL’s cell phone number as the contact number on the ads. The ads contained partially nude photographs of minor KB in sexually-explicit poses. According to the victims, during the night and into the morning, several men called for dates but none showed

¹⁴ A hotel staff member had knocked on the door to the victims’ room shortly before check-out time and a male had answered the door and advised that they were leaving as soon as his girlfriend got out of the shower.

up. Cabral and the other male were with the victims in the hotel room, but left shortly before the police arrived.

83. After providing consent for the search of their cell phones, law enforcement located two Backpage.com ads posted on April 25, 2017 in the New Haven area listing KL's cell number as the contact. In one of the ads, there is a partially-nude photograph of 16-year old KB. There was also a contact for "moemoney" listed in KL's phone. Conducting a search of Facebook for anyone using the name "Moe Money," law enforcement found a profile for Antonio "Moe Money" Cabral from Boston. In the profile, photos of Cabral matched the description of Moe Money provided by the victims. The subscriber information for the cell phone number associated with Moe Money came back to defendant Cabral's sister in Dorchester. On July 28, 2017, KL was shown an 8-pack photo line-up which included Cabral. After the first viewing, KL said she was unsure, but after a second viewing of the photographs, she identified the photograph of Cabral as the person she knew as "Moe Money" – the man who had transported her and KB from Massachusetts to Connecticut in April 2017 to have sex for money.

84. On February 15, 2018, Cabral was arrested in Dorchester on Connecticut state charges. During a video-recorded interview, Cabral stated that he goes by the name "Moe," but when asked about "Moe Money," he denied use of that name. He also stated, unprovoked, that he had nothing to do with "any girls." When asked specifically about KL and KB, Cabral said that they may know him, but claimed not to remember anything about April 25, 2017, or have any connection to the victims. When told that his name had come up in other prostitution investigations, Cabral stated that the girls were lying and "[t]hose girls never gave me money."

Cabral then stated that he did not post the ads on Backpage.com, but that the girls posted on their own.

October 28, 2017 - Maine

85. On or about October 28, 2017, a Westbrook Maine detective was working undercover in a human trafficking/prostitution investigation when he came across two advertisements on Backpage.com with very similar verbiage. However, the ads were for different females (“Mia” and “Baby Bella”) with different contact numbers. The detective made contact with “Mia,” and attempted to schedule a meeting. Despite texting about prices and the types of sexual acts, no meeting was arranged with “Mia.” The detective then made contact with “Bella,” who also discussed pricing and the types of sex acts that were included with a date. A prostitution date was arranged and “Bella” advised that she would be arriving in an Uber, a red Ford Explorer.

86. Law enforcement set up surveillance in the meeting area and proceeded to stop a red Ford Explorer with a male driver and a female backseat passenger. Both were interviewed by law enforcement. The driver was determined to be an Uber driver. He advised that the ride had been ordered by an account bearing the name “Damian.” He also stated that he was to pick up a passenger at the Econo Lodge in South Portland. The driver had also received a call from a male voice providing instructions on where to pick up the passenger. As the Uber driver was being interviewed, the telephone number associated with “Damian’s” account repeatedly called the Uber driver’s phone. After being instructed by law enforcement to pick up, the same male voice who had arranged the ride started asking questions about the female’s location and seemed

annoyed that the Uber bill had not yet been closed out. The female passenger seated in the back of the Uber matched the appearance of the female in the “Baby Bella” ad.

87. “Bella” was identified as an adult with the initials “AH.” AH admitted to law enforcement that she was supposed to be meeting a date set up via Backpage.com. She further stated that “Damian,” later identified as defendant Damian Cortez, was her boyfriend/pimp who was forcing her into prostitution and keeping all the money that she made from prostitution. According to AH, after meeting Cortez approximately one month before, he recruited her to work for him, promising that he would take care of her and help her re-gain custody of her child. However, Cortez was physically abusive to her and was using her drug addiction to keep her working for him. Detectives observed a large bruise on AH’s arm that she said was caused by Cortez; she also appeared to be suffering from drug withdrawal. AH stated that Cortez told her their arrangement “was a forever thing” and that if she left him, he would kill her. AH advised that she was in Portland with Cortez, “Moses” (later identified as defendant Moses Cabral), “Delven” (later identified as defendant Delven Carvalho-Centeio) and “Amanda” (who has been identified), and that they were staying at the Econo Lodge in South Portland. According to AH, the group of five had been traveling around New York and New England in a rented black SUV staying at different motels for a few days at a time where they would place ads on Backpage.com and arrange prostitution dates. According to AH, she worked under “Damian,” and Amanda worked for “Moses,” who kept most of Amanda’s money.

88. The detectives arranged for AH to contact “Damian.” When she did, “Damian” told her she had another date, ordered her to speak to the new “John” (sex customer), and told her to wait for another Uber to pick her up. When this Uber driver could not find her, “Damian”

called AH back and said he would pick her up. After AH gave “Damian” a location provided to her by the detectives, law enforcement stopped a black Chevy Tahoe, which was a rental vehicle. The driver was identified as defendant Delven Carvalho-Centeio; the front seat passenger as defendant Moses Cabral; the rear driver’s side passenger as defendant Damian Cortez, and the rear passenger side passenger as “Amanda,” who matched the appearance of the girl in the “Mia” ad. Cabral admitted that he had rented the SUV. Rental records confirmed that Cabral had rented the Tahoe in Boston. All four were arrested and charged in Maine.

89. During an inventory search of the vehicle, several cell phones were located. These included a white iPhone in a gold case claimed by “Amanda.” Visible on the screen at the time of seizure were messages attempting to arrange prostitution dates. When the number from the “Mia” Backpage.com ad was dialed, the gold phone rang. Two phones were found on the back seat where Cortez had been seated. When the number from the “Bella” ad was called, one of these phones rang.

V. FIREARMS CRIMES

90. On December 26, 2019, BPD received a call that a man was armed with a handgun at a third-floor apartment in Dorchester. The call identified that the man was defendant Brian Cardoso, and described his appearance. The call further identified that Cardoso was threatening people in the residence. BPD officers had responded to this location multiple times in the weeks leading up to this date based on domestic calls involving Brian Cardoso, and Cardoso had been instructed by BPD officers to cease coming to, or staying at, the location. At the time of this call, Cardoso (who has been identified as a NOB member) had been convicted of a felony and had served a sentence of two years for drug trafficking in Massachusetts.

91. Multiple BPD officers immediately responded to the location. One officer stationed himself near a back exit for the location. The officer heard someone walk down the back stairwell of the building consistent with attempting to exit. The officer then heard the person stop and walk back up the stairs. The person then attempted to exit the location and was stopped by the officer. The person was defendant Brian Cardoso. Cardoso's appearance matched the description given by the person who had called the BPD.

92. Officers commenced a search of the location for the reported firearm. In the back stairwell, where Cardoso had exited, an officer found a handgun hidden in a 55-gallon barrel on the third floor landing. The handgun was a loaded Ruger 9mm pistol (bearing serial number 309-02484). The recovered handgun has been reviewed by the ATF, and it has been determined that it traveled in interstate or foreign commerce.

CONCLUSION

93. Based on the evidence set forth above, there is probable cause to believe that Michael Brandao, Kelvin Barros, Ricky Pina, David Rodriguez, Wilson Goncalves-Mendes, Joshua Teixeira, Joseph Gomes, Samael Mathieu, Moses Cabral, and Delven Carvalho-Centeio agreed with each other and others known and unknown to engage in a Racketeering Conspiracy, in violation of 18 U.S.C. §1962(d) (Racketeer Influenced and Corrupt Organizations) ("RICO"), which is punishable under 18 U.S.C. §1963, by agreeing to conduct the affairs of an "enterprise," as defined in 18 U.S.C. §1961(4), that is, a group of individuals associated in fact, although not a legal entity, to wit: NOB, the activities of which affect interstate and foreign commerce, through a pattern of racketeering activity consisting of the acts or threats involving murder and robbery (including murder (Mass General Laws, Chapter 265 §1); attempted murder (Mass General

Laws, Chapter 265 §16); conspiracy to commit murder (Mass General Laws, Chapter 274 §7); assault with intent to commit murder (Mass General Laws, Chapter 265 §15); and armed assault with intent to murder (Mass General Laws, Chapter 265 §18); and armed robbery (Chapter 265 §17)), acts indictable under 18 U.S.C. §§1951, 1952, 1956, 2421, and offenses involving federal narcotics trafficking statutes. Defendant Darius Bass did engage in violent crimes in aid of racketeering (“VICAR”), 18 U.S.C. §1959(a)(3) and (5), that is for the purpose of maintaining or increasing his position in NOB, an enterprise engaged in racketeering activity, Bass did assault with a dangerous weapon and attempt to murder an individual in violation of Massachusetts law as set forth above. In addition to the RICO conspiracy and VICAR, as set forth in Paragraph 5 above, there is probable cause to believe that the defendants have violated other federal laws.

Signed electronically and sworn to via telephone in accordance with Federal Rule of Criminal Procedure 4.1 on June 15, 2020.

/s/ Daniel Campbell

Daniel Campbell
Special Agent
Bureau of Alcohol, Tobacco, Firearms &
Explosives

Electronically subscribed and telephonically
sworn to before me this 15th day of June 2020

Page Kelley
HONORABLE M. PAGE KELLEY
UNITED STATES MAGISTRATE JUDGE

